

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

-----X

Michael Lee Bobbitt, as administrator of the Estate of
Ann Rendueles, deceased and individually

Anita Chen, as administrator of the Estate of
Qu Zhao Ou, deceased and individually

Sin Yin Chiu, as administrator of the Estate of
Chung Lam Mui, deceased and individually

Toni Franks, as administrator of the Estate of
Joan Pisano, deceased and individually

**18 CV 11886
(GBD)(SN)**

Allison Kellan, as administrator of the Estate of
Salvatore Trani, deceased and individually

**SAUDI ARABIA SHORT
FORM COMPLAINT
AND DEMAND FOR
TRIAL BY JURY**

Kum S. Lee

Paula Quenelle

Dennis Quinn

Sonia Quinones

Jorge Quiroz

Edward Rademaker

Duane Ragan

Linda Ragan

Robert Ramirez

Rosa Ramirez

Wanda Ramos

Anita Rana

Tej Rana

Walter Rastatter, as administrator of the Estate of
William Rastatter, deceased and individually

Ronald Reda

Sandra C. Reese

Doris Reid

Scott Resnik

Stephanie Resvanis, as administrator of the Estate of
Mary Mavromatis, deceased and individually

Isaac Rhabb

Winsome Rhabb

Sylvia D Rhodes

Thomas R. Rhodes

Shari Ricco

Alton Riddick

Cesar Rivera

James Rivera

Sharon Robinson

Ebony Robinson-Toone

Denise Rodriguez

Saul Rodriguez

Victor Rodriguez

Vanessa Rogers-Hall

Jerone Rolle

Felipe Roman

Carole Romeo

Janet Rotter, as administrator of the Estate of
Lorraine Rotter, deceased and individually

Dabs Rousseau

Fred Rubin

Judith Rubin

Anna Pei Rupprecht

Joseph Russell

Patricia Russell

Eric Sabinsky

Wendy Sabinsky

Michael Sabo

Barbara Sacco

Nick Sacco

Guadalupe Salazar
Pedro Salazar
Scott Samuels
Maria Sanabria
Anthony Santora
Michele Saponara-Grassi
Frank Saulle
Norma Scale
Ralph Scannapieco
Barbara Scattareggia
Joseph Scattareggia
David Schneck
Katy Schneck
Malvin Schuster
Michael J. Sclafani
Victoria Sclafani
Veronica Serrone
Desmond Seville
Matthew Shafiroff
Patrick Sheldon, as administrator of the Estate of
John Cassidy, deceased and individually
Maureen Shindle
Bhaskar Sil
Sonja Gisela Sil
John Silverman
Penelope Simone
John Sjursen, Jr.
Catherine Ann Sjursen
Kevin Skinner
Richard Solomon
Jean Somerville
Paul Somerville
Edward Sparrow
April Spates
Ellen Spencer

John Spencer

Pamela Stackowitz

Terence Stackowitz

Roland Stancione

Jeriann Stella, as administrator of the Estate of
Anthony Marotta, deceased and individually

William Streath

Lisa Anne Striano

Robert Striano

Patricia Strizak

Raghunath Subramanian

Santhy Subramanian

Robert Sullivan

Dawn Sulmasy, as administrator of the Estate of
Warren Sulmasy, deceased and individually

PLAINTIFFS,

-against-

KINGDOM OF SAUDI ARABIA,

DEFENDANT.

X

Plaintiffs named herein by and through the undersigned counsel file this Short Form Complaint against Defendant, the Kingdom of Saudi Arabia, arising out of the September 11, 2001 terrorist attacks (“September 11, 2001 Terrorist Attacks”), as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045. Each Plaintiff incorporates by reference the specific allegations, as indicated below, of (a) the Consolidated Amended Complaint as to the Kingdom of Saudi Arabia, ECF No. 3463, or (b) the Complaint Against the Kingdom of Saudi Arabia, Ashton v. Kingdom of Saudi Arabia, No. 17-CV-2003 (GBD)(SN) (S.D.N.Y. Mar. 30, 2017), ECF No. 1.

Upon filing this Saudi Arabia Short Form Complaint, each Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as

specified below; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction is premised on the grounds set forth in the complaints specified below, and further, jurisdiction of this Saudi Arabia Short Form Complaint is premised upon and applicable to all defendants in this action:

- 28 U.S.C. § 1605(a)(5) (non-commercial tort exception)
- 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act)
- 28 U.S.C. § 1330 (actions against foreign states)
- Other (set forth below the basis of any additional ground for jurisdiction and plead such in sufficient detail as per the FRCP): _____

_____.

CAUSES OF ACTION

3. Each Plaintiff hereby adopts and incorporates herein by reference the following factual allegations, jurisdictional allegations, and jury trial demand in the following complaint [check only one complaint] and the following causes of action set forth in that complaint:

Consolidated Amended Complaint as to the Kingdom of Saudi Arabia, ECF No. 3463 (check all causes of action that apply)

- COUNT I – Aiding and Abetting and Conspiring with Al Qaeda to Commit the September 11th Attacks upon the United States in violation of 18 U.S.C. § 2333(d) (JASTA).
 - COUNT II – Aiding and Abetting and Conspiring with Al Qaeda to Commit the September 11th Attacks upon the United States in violation of 18 U.S.C. § 2333(a).
 - COUNT III – Committing Acts of International Terrorism in violation of 18 U.S.C. § 2333.
 - COUNT IV – Wrongful Death.
 - COUNT VI – Alien Tort Claims Act.
 - COUNT VII – Assault and Battery.
 - COUNT VIII – Conspiracy.
 - COUNT IX – Aiding and Abetting.
 - COUNT X – Intentional Infliction of Emotional Distress.
 - COUNT XII – Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Supervising Employees and Agents.
 - COUNT XIII – Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Hiring, Selecting, and Retaining Employees and Agents.
 - COUNT XIV – 18 U.S.C. § 1962(a)–(d) – CIVIL RICO.
 - COUNT XV – Trespass.
 - COUNT XVI – Violations of International Law.
- Complaint Against the Kingdom of Saudi Arabia, Ashton v. Kingdom of Saudi Arabia, No. 17-CV-2003 (GBD)(SN) (S.D.N.Y. Mar. 30, 2017), ECF No. 1 (check all causes of action that apply)**
- First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

- First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)
- Second Cause of Action for Wrongful Death Damages Pursuant to State Tort Law
- Second Cause of Action for Personal Injury Damages Pursuant to State Tort Law
- Third Cause of Action for Wrongful Death Damages Pursuant to the Alien Tort Claims Act
- Third Cause of Action for Personal Injury Damages Pursuant to the Alien Tort Claims Act
- Each Plaintiff asserts the following additional theories and/or Causes of Action against the Kingdom of Saudi Arabia: _____

_____.

IDENTIFICATION OF PLAINTIFFS

4. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this Saudi Arabia Short Form Complaint, herein referred to as "Plaintiffs."
 - a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this Saudi Arabia Short Form Complaint.
 - b. Plaintiff is entitled to recover damages on the causes of action set forth in this Saudi Arabia Short Form Complaint.
 - c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
 - d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, on or after September 11, 2001, said Plaintiff was present at the Pentagon and/or

the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.

- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the Saudi Arabia Short Form Complaint, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
- f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or solatium claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each Plaintiff.

IDENTIFICATION OF THE DEFENDANT

5. The only Defendant named in this Saudi Arabia Short Form Complaint is the Kingdom of Saudi Arabia.

NO WAIVER OF OTHER CLAIMS

6. By filing this Saudi Arabia Short Form Complaint, Plaintiff(s) is/are not waiving any right to file suit against any other potential defendants or parties.

7. By filing this Saudi Arabia Short Form Complaint, Plaintiff(s) are not opting out of any class that the Court may certify in the future.

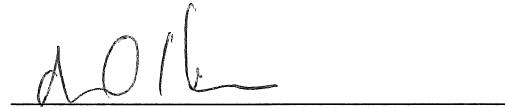
JURY DEMAND

8. Each Plaintiff hereby demands a trial by jury as to the claims in this action.

WHEREFORE, Plaintiffs pray for relief and judgment against Defendant as set forth in this Saudi Arabia Short Form Complaint as appropriate.

Dated: December 14, 2018

Respectfully Submitted,



Daniel J. Hansen, Esq. (DH0211)
Turley Hansen & Rosasco, LLP
3075 Veterans Memorial Highway
Suite 210
Ronkonkoma, NY 11779
Phone: 631-268-0042
dhansen@911cancerclaim.com

/s/ Troy G. Rosasco

Troy G. Rosasco Esq. (TR4942)
Turley Hansen & Rosasco, LLP
3075 Veterans Memorial Highway
Suite 210
Ronkonkoma, NY 11779
Phone: 631-268-0042
trosasco@911cancerclaim.com